

**REMARKS**

Claims **1, 2** and **6-27** are pending in the application.

Claims **1, 2** and **6-27** have been rejected.

Claims **1, 6-7, 13-16, 20** and **21-27** have been amended. No new matter has been added. Support for the amendments to claims 1, 13, and 20 can be found, at least, within paragraphs [0030]–[0032], and Figs. 9, 10, and 11. Amendments to claims 6, 7, 14, 15, 16, and 21-27 have been made for purposes of clarification and consistency.

*Rejection of Claims under 35 U.S.C. § 102(e)*

Claims 1, 2, 6-27 stand rejected under 35 U.S.C. § 102(e) as purportedly being unpatentable over U.S. Patent Publication No. 2007/0208608 naming Amerasinghe, et al. as inventors (“Amerasinghe”). Applicants respectfully traverse this rejection.

Applicants respectfully submit that Amerasinghe fails to teach or suggest, at the least, automatically generating a forecast snapshot that includes validating a hierarchy of forecast participants. As an initial matter, the Office Action posits that Amerasinghe discloses validating a hierarchy of participants, in some way. However, the cited portion of Amerasinghe deals only with an initial definition of a hierarchy. “Defining” is in no way comparable to “validating.” Further, Claim 1 further recites that the validation recited therein is performed as part of the forecast generation. Even if Amerasinghe’s “defining” could somehow be successfully equated to the claimed “validating” (inappropriate as such a parallel would be), Amerasinghe does not (and cannot) “define” a hierarchy during the generation of a forecast.

Independent claim 1, as amended, recites the following limitations:

defining a forecast snapshot, wherein the defining comprises:  
    receiving an interval, wherein  
        the interval specifies a frequency at which forecast  
        snapshots are generated,  
    receiving a specified day within the interval, wherein  
        the forecast snapshot is generated on the specified day, and  
    receiving specified roles of participants, wherein  
        the forecast snapshot comprises information representing a  
        member of the organization, and  
        the information indicates the member is assigned one of the  
        specified roles;  
causing a processor of the computer system to automatically generate the  
forecast snapshot, wherein  
    the causing the processor to automatically generate the forecast  
    snapshot comprises causing the processor to validate a  
    hierarchy of the participants,  
    the forecast snapshot is based on opportunity information of the  
    participants, and  
    the forecast snapshot comprises the opportunity information; and  
causing the processor to automatically send an alert notifying the  
participants of the generation of the forecast snapshot.

(Emphasis added). Amended independent claims 13 and 20 contain similar limitations.

The Office Action cites the following section of Amerasinghe as purportedly teaching the claimed “automatically generate the forecast snapshot comprises causing the processor to validate a hierarchy of the participants” limitation:

A high-level flowchart corresponding to a typical forecasting process in accordance with the present invention is shown in FIG. 1. The process begins in a block 10, wherein members of a sales or marketing organization are defined, along with the hierarchy for the organization. The hierarchy defines the various management levels of the organization and identifies the report paths for each member of the organization (e.g., a sales representative reports to a region manager, who reports to a national manager, who reports to a vice president of sales, etc.) An exemplary organization hierarchy 11 is shown in FIG. 2.

Amerasinghe ¶ [0047] (emphasis added). As an initial matter, nowhere in the cited passage, or elsewhere in Amerasinghe (insofar as Applicants are able to discern), is there any mention of any kind of “validating.” In rejecting Claim 6, the Office Action posits

that the above passage somehow discloses “ensuring correctness of a hierarchy of the participants ... Members of a hierarchy are defined.” Office Action, p. 4 (emphasis added). First, the above passage makes no mention of “ensuring correctness” of anything. Second, one of ordinary skill in the art would have no basis for understanding the “defining” discussed therein to teach or suggest the claimed “validating.” The two words simply have different meanings, and neither can be interpreted to mean the other. For example, “defining” is commonly understood as being performed at the outset, while “validating” is an operation done subsequently. More specifically, again by way of example: a variable must first be defined; only after a variable has been defined can the variable (or its contents) be validated. Thus, Amerasinghe’s defining step cannot be said to teach or suggest the claimed “validating,” even in the simplest understanding of these terms.

Further, even if the term “defining” could somehow be interpreted to mean “validating” (a point which Applicants do not concede), Amerasinghe performs the defining step as a single initial step (Fig. 1, box 10) before the forecast series is created (Fig. 1, box 12). *See* Amerasinghe Fig. 1. Aside from the fact that Amerasinghe thus uses the term “defining” in a manner that is consistent with Applicant’s earlier-presented interpretation, it can be seen that Amerasinghe performs the defining step (Fig. 1, box 10) before the forecast is generated (Fig. 1, boxes 16 and 18). Thus, as is to be expected in light of the foregoing, Amerasinghe does not and cannot perform the defining step as part of the forecast generation. By marked contrast, Claim 1 recites that the automatic generation of the forecast snapshot comprises the validation of a hierarchy of the participants. Thus, given that Amerasinghe’s only discussion of a “defining” step is one that occurs as part of initialization, Amerasinghe is incapable of teaching or even contemplating the validation of a hierarchy of participants as part of forecast snapshot generation, as recited more fully in Claim 1.

For at least these reasons, Applicants submit that Amerasinghe does not provide disclosure of all the elements of independent claims 1, 13, and 20, and dependent claims 2, and 6-27, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

CONCLUSION

In view of the amendments and remarks set forth herein, the Application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5092.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

/ Samuel G. Campbell III /

Samuel G. Campbell III  
Attorney for Applicants  
Reg. No. 42,381  
Telephone: (512) 439-5084  
Facsimile: (512) 439-5099